

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Parlement Technologies, Inc.  
(f/k/a Parler LLC, f/k/a Parler Inc.)

Debtor.

Chapter 11

Case No. 24-10755 (CTG)

**Objection Deadline: October 7, 2024 at 4:00 p.m. (ET)**

**SUMMARY OF THIRD MONTHLY APPLICATION OF POTTER  
ANDERSON & CORROON LLP FOR COMPENSATION FOR SERVICES  
RENDERED AND FOR REIMBURSEMENT OF EXPENSES AS  
COUNSEL TO THE DEBTOR AND DEBTOR IN POSSESSION  
FOR THE PERIOD AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Name of Applicant: Potter Anderson & Corroon LLP

Authorized to Provide Professional  
Services to: the above-captioned Debtor and Debtor  
in Possession

Date of Retention: July 31, 2024 effective as of June 13, 2024

Period for which compensation  
and reimbursement are sought: August 1, 2024 through August 31, 2024

Amount of Compensation sought as actual,  
reasonable, and necessary: \$98,998.40 (80% of \$123,748.00)

Amount of Expense Reimbursement sought  
as actual, reasonable, and necessary: \$0.00

This is a(n): X monthly \_\_\_\_ interim \_\_\_\_ final application

Previously Filed Applications:

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved / Pending Approval Fees (80%)	Approved / Pending Approval Expenses (100%)
August 7, 2024 [Docket No. 127]	June 13, 2024 – June 30, 2024	\$77,191.50	\$303.40	\$61,753.20	\$303.40
August 19, 2024 [Docket No. 151]	July 1, 2024 – July 31, 2024	\$152,609.50	\$574.33	\$122,087.60	\$574.33

**COMPENSATION BY PROFESSIONAL**  
**AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Name of Professional Individual	Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice	Hourly Billing Rate (including changes)	Total Hours Billed	Total Compensation
Jeremy W. Ryan	Joined firm as a Partner in 2009. Member of DE Bar since 2001.	\$1,075	43.8	\$47,085.00
R. Stephen McNeill	Joined firm as an Associate in 2008. Counsel in 2019. Partner in 2023. Member of DE Bar since 2008.	\$850	36.4	\$30,940.00
James R. Risener III	Joined firm as an Associate in 2023. Member of GA Bar since 2020. Member of the DE Bar since 2024.	\$540	40.4	\$21,816.00
Sameen Rizvi	Joined firm as an Associate in 2021. Member of the DE Bar since 2022.	\$490	28.6	\$14,014.00
Cynthia M. Caskey	Joined firm as a Paralegal in 2013. Paralegal since 1996.	\$430	0.3	\$129.00
Kristin A. McCloskey	Joined firm as a Paralegal in 2023. Paralegal since 2004.	\$370	1.4	\$518.00
Lauren C. Huber	Joined firm as a Paralegal in 2019. Paralegal since 2018.	\$345	26.8	\$9,246.00
<b>TOTAL</b>			<b>177.7</b>	<b>\$123,748.00</b>
			<b>Grand Total</b>	<b>\$123,748.00</b>
			<b>Attorney Compensation</b>	<b>\$113,855.00</b>
			<b>Total Attorney Hours</b>	<b>149.2</b>
			<b>Blended Attorney Rate</b>	<b>\$763.10</b>

**COMPENSATION BY PROJECT CATEGORY**  
**AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

<b>Project Category</b>	<b>Hours</b>	<b>Amount</b>
Asset Analysis and Recovery (AA)	0.0	\$0.00
Litigation/Adversary Proceedings (AP)	36.9	\$26,689.50
Business Operations (BO)	6.9	\$4,821.00
Case Administration (CA)	2.8	\$1,187.00
Court Appearances/Communications/Hearings (CH)	8.1	\$3,668.50
Creditor Inquiries (CI)	0.0	\$0.00
Financing/Cash Collateral/DIP (CR)	25.6	\$19,409.00
Employment Applications/Objections (EA)	9.0	\$6,132.00
Employee Matters (EB)	0.0	\$0.00
Executory Contracts and Leases (EC)	0.0	\$0.00
Fee Applications/Objections (FA)	4.1	\$1,936.50
Fee Applications/Objections (Potter Anderson) (FP)	11.6	\$4,655.50
Tax Issues/Corporate Matters (MA)	0.2	\$170.00
Meetings (MC)	2.9	\$1,818.50
Relief from Stay Proceedings (MR)	0.0	\$0.00
Claims Administration and Objections (PC)	24.1	\$17,032.50
Plan and Disclosure Statement (PL)	6.4	\$2,970.00
Asset Disposition/Use, Sale (SA)	38.7	\$33,026.00
Schedules & Statements/MORs/UST Reporting (SS)	0.4	\$232.00
Communications with Debtor or Trustee (TR)	0.0	\$0.00
Utilities (UM)	0.0	\$0.00
Valuation (VT)	0.0	\$0.00
Non-Working Travel (NWT)	0.0	\$0.00
<b>TOTAL</b>	<b>177.7</b>	<b>\$123,748.00</b>

**EXPENSE CATEGORY**  
**AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

<b>Expense Category</b>	<b>Amount</b>
Copies (10 cents per page)	\$0.00
Color Copies (80 cents per page)	\$0.00
Digital Scanning/Reproduction (DLS Discovery)	\$0.00
Legal Research	\$0.00
Postage	\$0.00
Federal Express	\$0.00
Long Distance / Client Telephone	\$0.00
Miscellaneous Court Costs	\$0.00
Pacer Electronic Records	\$0.00
Special Delivery & Daily Runner Services (Parcels)	\$0.00
Court Reporter (Reliable)	\$0.00
E-Filing	\$0.00
Meals	\$0.00
Secretary of State	\$0.00
<b>TOTAL</b>	<b>\$0.00</b>

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**THIRD MONTHLY APPLICATION OF POTTER ANDERSON & CORROON LLP  
FOR COMPENSATION FOR SERVICES RENDERED AND FOR REIMBURSEMENT  
OF EXPENSES AS COUNSEL TO THE DEBTOR AND DEBTOR IN  
POSSESSION FOR THE PERIOD AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Pursuant to sections 330 and 331 of title 11 of the United States Code, §§ 101-1532 (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and in accordance with that certain *Order Authorizing the Debtor to Retain and Employ Potter Anderson & Corroon LLP as Counsel to the Debtor and Debtor in Possession Pursuant to Section 327(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rule 2014-1, Effective as of the June 13, 2024* [Docket No. 123] (the “Retention Order”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 62] (the “Interim Compensation Order”), Potter Anderson & Corroon LLP (“Potter Anderson”) hereby applies (this “Application”) to the United States Bankruptcy Court for the District of Delaware (the “Court”) for reasonable compensation for professional legal services rendered as co-counsel to the above captioned debtor and debtor in possession (the “Debtor”) in the amount of \$123,748.00, together with reimbursement for actual and necessary expenses incurred in the amount of \$0.00, for the period August 1, 2024 through August 31, 2024 (the “Monthly Fee Period”). In support of this Application, Potter Anderson respectfully represents as follows:

## **BACKGROUND**

1. On April 15, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the Court commencing the above-captioned chapter 11 case (this “Chapter 11 Case”).

2. The Debtor has continued possession of its property and has continued to operate and maintain its business as debtor in possession under sections 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this Chapter 11 Case.

3. Potter Anderson was retained effective as of June 13, 2024 by the Retention Order, dated July 31, 2024 [Docket No. 123]. The Retention Order authorizes Potter Anderson to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

## **SUMMARY OF SERVICES RENDERED**

4. Attached hereto as Exhibit A is a detailed statement of fees incurred during the Monthly Fee Period, showing the amount of \$123,748.00 due for fees.

5. The services rendered by Potter Anderson during the Monthly Fee Period are grouped into the categories set forth in Exhibit A. The attorneys and paralegals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in the attachments hereto.

## **ACTUAL AND NECESSARY EXPENSES**

6. Potter Anderson did not incur any out-of-pocket expenses during the Monthly Fee Period.

### **VALUATION OF SERVICES**

7. Attorneys and paraprofessionals of Potter Anderson have expended a total of 177.7 hours in connection with this matter during the Monthly Fee Period.

8. The amount of time spent by each of these persons providing services to the Debtor for the Monthly Fee Period is fully set forth in the detail attached hereto as **Exhibit A**. These are Potter Anderson's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Potter Anderson for the Monthly Fee Period as counsel for the Debtor in these cases is \$123,748.00.

9. Potter Anderson believes that the time entries included in **Exhibit A** attached hereto are in compliance with the requirements of Local Rule 2016-2.

10. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (a) the complexity of this Chapter 11 Case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

11. This Application covers the fee period from August 1, 2024 through and including August 31, 2024. Potter Anderson has continued, and will continue, to perform additional necessary services for the Debtor subsequent to the Monthly Fee Period, for which Potter Anderson will file subsequent monthly fee applications.

*[Remainder of Page Intentionally Left Blank]*

**CONCLUSION**

**WHEREFORE**, Potter Anderson respectfully requests allowance be made to it in the sum of \$123,748.00 as compensation for necessary professional services rendered to the Debtor for the Monthly Fee Period, and the sum of \$0.00 as reimbursement of actual necessary costs and expenses incurred during that period, and requests such other and further relief as the Court may deem just and proper.

Dated: September 16, 2024  
Wilmington, Delaware

Respectfully submitted,

*/s/ Sameen Rizvi*

Jeremy W. Ryan (No. 4057)  
R. Stephen McNeill (No. 5210)  
James R. Risener III (No. 7334)  
Sameen Rizvi (No. 6902)

**POTTER ANDERSON & CORROON LLP**

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*Counsel for the Debtor and Debtor in Possession*

**VERIFICATION**

I, Jeremy W. Ryan, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge and based on the information and records available to me:

- a) I am a Partner with the applicant firm, Potter Anderson & Corroon LLP and have been admitted to appear before this Court.
- b) I am familiar with the work performed on behalf of the Debtor by the professionals in the firm.
- c) I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Del. Bankr. L.R. 2016-2, and submit that the Application substantially complies with such rule.

*/s/ Jeremy W. Ryan*  
\_\_\_\_\_  
Jeremy W. Ryan (No. 4057)